



Wilson Sonsini Goodrich & Rosati
Professional Corporation
1301 Avenue of the Americas
40th Floor
New York, New York 10019-6022
O: 212.999.5800
F: 212.999.5899

February 13, 2020

VIA CM/ECF

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Mao, No. 1:19-cr-00392-PKC

Dear Judge Chen:

We represent Professor Bo Mao, who is charged by single-count Information in the above-referenced case. We write in response to the government's letter filed under seal earlier today giving notice to the Court pursuant to Local Rule 50.3.2(c)(1) that the above-captioned prosecution is now presumptively related to United States v. Huawei Technologies Co., Ltd., et al., No. 1:18-cr-00457-AMD, but not requesting reassignment.

We have since confirmed with the government that it is not seeking reassignment of Professor Mao's case and is merely providing the Court with the notice required by Local Rule 50.3.2. Indeed, there is no reason to believe that reassignment would result in "a significant savings of judicial resources or serve the interests of justice." Local Rule 50.3.2(b)(2). Accordingly, if the Court is considering transferring Professor Mao's case *sua sponte*, we ask for an opportunity to be heard.

**WILSON
SONSINI**

The Honorable Pamela K. Chen
February 13, 2020
Page 2

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman

Morris J. Fodeman
Michael S. Sommer

THOMPSON & KNIGHT, LLP

s/ Richard Bratton Roper, III

Richard Bratton Roper, III

Counsel for Professor Bo Mao

cc: The Honorable Ann M. Donnelly (via Hand Delivery)
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Huawei Technologies Co., Ltd., et al., No. 1:18-cr-00457-AMD

and

All Counsel of Record (via CM/ECF)